

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA

Ronald L. Cosner, pro se,
Plaintiff,

v

Case No. 2:20-cv-00536 RORY L. PERRY II, CLERK
(To be Supplied by U.S. District Court
Southern District of West Virginia)

Novartis, Inc.,
Defendant.

FILED
AUG 10 2020

Complaint Under U.S.C. § 1332

I. Parties :

1.) Plaintiff:

Name: Ronald L. Cosner

Address: M.O.C.C., One Mountainside Way,
Mt. Olive, W.V. 25185

2.) Defendant:

Name: Novartis, Inc.,

Address: 230 Park Ave., 21ST Floor
New York, N.Y. 10169

II. Statement of Claim :

1.) Novartis, Inc., make a product used to treat heartburn and acid reflux among other ailments such as ulcers of the stomach, called Zantac (ranitidine).

2.) I, the plaintiff have been taking this product made by Novartis, Inc., for approximately 20 years of my life, as I'm now 40 years old. I have spent and used approximately \$14,400.00 on this product over the years to treat my medical conditions.

II. Statement of Claim : (continued from page 1.)

3.) In April of 2020, I discovered that the medication Zantac contains a chemical called N.D.M.A. and this chemical has been known to cause cancer of various types which can very well be life-threatening. Due to the fact I have been consuming this cancer causing medication, I'm much more likely to develop cancer sometime during the course of my life. Also, I would not have consumed close to \$15,000.00 of medication, had I been aware it may lead to development of cancer. I would simply have used a different medication to treat my ailments, not one which poisons the taker with cancer.

III. Relief Sought :

- 1.) All costs associated with this suit.
- 2.) A trial on all issues triable by Jury.
- 3.) Compensatory Damages in the amount of \$14,400.00 for money spent on the medication Zantac, and \$150,000.00 in Compensatory and Punitive Damages for making me more likely to develop cancer in the future and to which I may already have.
- 4.) Any and all other relief this honorable court deems, just, proper and equitable.

IV. Verification of Complaint:

I, Ronald L. Cosner, do hereby verify under the penalties of perjury that this foregoing complaint is true and correct to the very best of my knowledge and belief.

Date and Signature: Ronald L. Cosner 8/5/2020

Address: M.O.C.C., 1 Mountainside Way, Mt. Olive, W.V. 25185